

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:** §                   **CASE NO: 20-31835-H2-13**  
**Keith Damien Johnson**       §  
**Melissa Ann Johnson**      §  
                                §                   **CHAPTER 13**  
                                §

**NOTICE OF FEES DUE PURSUANT TO FIXED FEE AGREEMENT FOR RESPONSE  
TO TRUSTEE'S MOTION TO DISMISS**

**TO THE HONORABLE JUDGE OF SAID COURT:**

Kenneth A. Keeling, Counsel for debtor(s), entered into a fixed fee agreement for the representation of the debtor(s). This agreement was approved by the Court's Order at Docket No. 5.

1. Kenneth A. Keeling, or an attorney in his office, has filed a response to the Trustee's Motion to Dismiss filed on January 26, 2021 at Docket No. 59 in Debtor(s) bankruptcy case.
2. The first hearing date was more than 120 days following the confirmation of the plan. Kenneth A. Keeling has not been paid directly by Debtor(s) for this work.
3. Therefore, Kenneth A. Keeling should be paid \$275.00 by the Chapter 13 Trustee through the confirmed plan.

March 2, 2021

Respectfully submitted,  
KEELING LAW FIRM

/s/Kenneth A. Keeling  
Kenneth A. Keeling; TBN 11160500  
Yolanda Gutierrez; TBN 24041028  
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Houston, Texas 77007  
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**CERTIFICATE OF SERVICE**

I hereby certify a true and correct copy of the foregoing has been served either electronically or by United States First Class Mail on this March 2, 2021 to the following parties and the affected creditors listed below:

**UNITED STATES TRUSTEE**

United States Trustee  
515 Rusk, Ste. 3516  
Houston, TX 77002

**CHAPTER 13 TRUSTEE**

William E Heitkamp  
9821 Katy Freeway, Suite 590  
Houston, TX 77024

**DEBTOR(S)**

Keith Damien Johnson and Melissa Ann Johnson  
25507 Holly Springs Place  
Spring, TX 77373

Respectfully submitted,  
**KEELING LAW FIRM**  
/s/ Kenneth A. Keeling  
**ATTORNEY FOR DEBTORS**